

W. Bryan Dixon
10 Heritage Cove
Logan, UT 84321-3300
C: 435-760-0691
bdixon@xmission.com

December 16, 2013

Bill Damery
Utah Division of Water Quality
P.O. Box 144870
Salt Lake City, Utah 84114-4870
wdamery@utah.gov

Re: DRAFT Approval of 401 Water Quality Certification with
Conditions. DRAFT Water Quality 401 Certification No.: SPK
2011-00755. USACE 404 Permit No.: SPK 2011-0755, dated
December 6, 2013. Applicant: Union Pacific Railroad.

Mr. Damery,

I am an interested citizen and former Conservation Chair and President of Bridgerland Audubon Society in Logan, Utah. I value the ecology of the Great Salt Lake (GSL), and I enjoy its environs for bird watching, camping, hiking, and general exploring in a remote and rugged part of the Great Basin. I marvel at its simplicities and its complexities, and I have introduced many people to its natural wonders.

I am increasingly concerned about the trends in long term water quality and how changes may disrupt an ecosystem that is critical for millions of waterfowl and shorebirds. One of these concerns involves changes in salinity associated with the causeway constructed by the Union Pacific Railroad (UPRR).

It is gratifying that the Utah Division of Water Quality (UDWQ) shares some of these concerns and I offer my support for UDWQ holding UPRR's feet to the fire to ensure that water quality does not suffer as a result of either continued operation of the causeway or modifications to it.

Apparently, UPRR has convinced everyone that the decay of the east culvert in the causeway is an emergency and they need immediate approval to close this culvert, after raising an earlier and similar alert about the west culvert just a little over a year ago. One would think that a company with resources such as UPRR would have contingency plans in place for these and similar events so as to avoid rushing into design, permitting, and construction.

Nevertheless, I understand the urgency generated by the safety issues involved and I support a temporary 401 permit contingent on the requirements set forth by UDWQ. In particular, it will be critical to update the modeling of water quality in the GSL and immediately begin comprehensive monitoring in order to know current conditions, accurately evaluate alternatives, and assess results of whatever course of action is finally undertaken.

I believe it was inappropriate for the US Army Corps of Engineers (USACE) to use a Nationwide Permit process for this project and for the UPRR to allow conditions to erode to the point where an emergency permitting process may be required. I have had very limited time to formulate comments and I reserve the right to amend and augment these comments at a later date.

In the meantime, I support the comments provided by Friends of Great Salt Lake submitted today.

Sincerely,

W. Bryan Dixon